

Consumer Policy Unit  
Market Conduct Division  
Treasury  
Langton Cres  
Parkes ACT 2600

Email: [Consumerlaw@treasury.gov.au](mailto:Consumerlaw@treasury.gov.au)

Dear Madame/Sir,

Accord is pleased to provide this submission to the Treasury on the *Competition and Consumer (Industry Codes – Unit Pricing) Regulations 2021 (the Regulations)*.

Accord is the peak national industry association representing the manufacturers and marketers of formulated hygiene, personal care and specialty products, their raw material suppliers, and service providers. Accord member companies make and/or market fast-moving consumer and commercial goods including hygiene, cosmetic, personal care and specialty products, sunscreens, food contact sanitisers, industrial and agricultural sanitisers, household pesticides, disinfectants, and specialty commercial products. Member companies include large global consumer product manufacturers as well as small dynamic Australian-owned businesses. A list of Accord member companies is available on our website: <http://accord.asn.au/about/members>.

Headline statistics<sup>1</sup> for our industry's economic footprint include:

- Accord's membership is approximately 100 companies.
- Collectively, Accord member companies directly contribute more than 12,000 full-time equivalent jobs.
- Nationally, more than 175 offices and more than 65 manufacturing sites are operated by Accord member companies.
- 80% of member companies export products overseas.

Accord would like to offer its support in favour of the Regulations and agrees that customers can benefit from unit pricing as it helps to simplify decisions, supports value-for-money assessments, and saves time and money. Accord believes the Retail Grocery Industry (Unit Pricing) Code of Conduct (the Code) is successful and is happy with the key findings in the review, especially the low ongoing regulatory costs associated with continuing to provide unit pricing. For these reasons Accord is happy for the Regulations to remain ongoing without substantive change after the scheduled sunset date.

Accord would most importantly like to share its agreement with the review's analysis on non-grocery retailers; the review found that there did not appear to be significant consumer benefits from imposing mandatory unit pricing in sectors such as pharmacies and hardware stores. Accord agrees with this evaluation and believes that the imposition of mandatory unit pricing would be more of a burden in associated regulatory costs than it would be benefit to the consumer.

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<sup>1</sup> Results from Accord Industry Size and Scale Survey 2018

Accord would like to congratulate the Treasury on the Regulations which have been successful and helpful to consumers.

Should you have any questions in relation to Accord's submission, the contact officer is Thomas Dolahenty, who can be contacted at [tdolahenty@accord.asn.au](mailto:tdolahenty@accord.asn.au).

Yours sincerely

Catherine Oh  
**Director, Regulatory & Supply Chain Strategy**

11 June 2021